

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CAROLYN GREENE, on behalf herself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 03-CV-12628

JOHN G. ESPOSITO, JR., D.D.S., on
behalf himself and all others similarly
situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10013

JOSEPH L. KING, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10038

[Additional Captions Follow on Next Page]

Michael E. CRIDEN, on behalf himself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10046

ISRAEL SHURKIN and SHARON
SHURKIN on behalf themselves and all
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10055

JAMES J. NIZZO and VIRGINIA C.
NIZZO, as JOINT TENANTS and CARLO
CILIBERTI, on behalf of themselves and
all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10065

[Additional Captions Follow on Next Page]

BARRY BROOKS, on behalf himself and
all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10077

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

ANASTASIOS PERLEGIS, on behalf
himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10078

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

MARTIN WEBER, on behalf of himself
and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10090

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

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BRUCE HAIMS, on behalf himself and all
others similarly situated,

Plaintiff,

Civil Action No. 04-10144

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

MODEL PARTNERS LIMITED, on behalf
themselves and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10155

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

JUNE E. PATENAUDE, on behalf of
herself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10179

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

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NANCY L. PINCKNEY and GERTRUDE
PINCKNEY, on behalf themselves and all
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10189

W. KENNETH JOHNSON, on behalf
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10190

GREGORY KRUSZKA, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10202

**GEORGE ELIOPOULOS, DALE SELF AND MARK MENTZ'S MOTION FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS,
AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

George Eliopoulos, Dale Self and Mark Mentz, by their counsel, hereby respectfully move this Court to: (i) consolidate all related actions; (ii) be appointed Lead Plaintiffs in the consolidated securities class action; and (iii) approve its selection and retention of Berman DeValerio Pease Tabacco Burt & Pucillo (“Berman DeValerio”) and Cohen, Milstein, Hausfeld & Toll, P.L.L.C. as Lead Counsel.

In support of this Motion, Plaintiffs submit herewith a Memorandum of Law, the Declaration of Jeffrey C. Block, Esq., and a Proposed Order.

Dated: March 1, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**

/s/ Jeffrey C. Block

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**COHEN, MILSTEIN, HAUSFELD &
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**Attorneys for Plaintiffs George
Eliopoulos, Dale Self and Mark Mentz**

Proposed Lead Counsel